



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF FOR LOGISTICS
500 ARMY PENTAGON
WASHINGTON DC 20310-0500

DALO-SMP

12 DEC 1997

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Purchase of Hazardous Materials with the International Merchant Purchase Authorization Card or Local Purchase Agreements

1. Reference memorandum, HQDA, DALO-SMP, 11 July 1997, subject: Installation Hazardous Materials Management Program Implementation (Encl).
2. The reference directed MACOMs to establish procedures to implement centralized hazardous material (HM) management at their installations. The purchase of HM using International Merchant Purchase Authorization Cards (IMPAC) and local purchase agreements presents a challenge to commanders who are charged with the control of such materials. These purchases are less visible than material acquired through normal supply channels, increasing the risk that information vital to the control of HM will not be captured. Pursuant to this, MACOMs and installations will establish controls on the purchase of HM with IMPACs and through local purchase agreements to restrict and track the entry of HM onto an installation. As a minimum, these controls will:
 - a. Ensure full visibility of all HM at any given time.
 - b. Ensure least toxic and least amount of HM is acquired, stored, or used.
 - c. Ensure all HM is properly handled, stored, and disposed.
3. There are several alternative methods to control these purchases. These can range from having one central activity acquiring and controlling all HM to decentralized purchase and control, but centralized tracking. Local policy developed should be based on the specific mission and local requirements.
4. IMPAC and local purchase agreement purchases of HM without the proper controls represent one avenue by which HM can get on an installation without the commander's approval or knowledge. Given statutory requirements, commanders are at risk without proper policies to control HM on installations. A significant amount of Army hazardous waste disposal, as well as approximately 75 percent

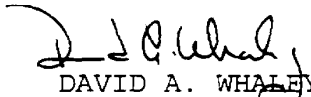


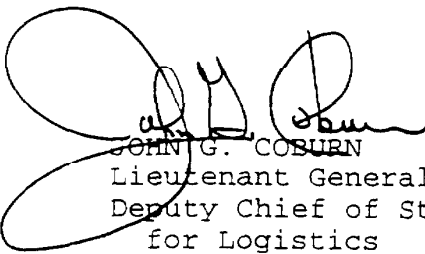
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of the Army's RCRA Notices of Violations and accompanying fines, is related to the disposition of excess HM. This is a drain on readiness resources that Army organizations cannot afford.


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Enclosure

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